

THE LAW OFFICE OF
KAREN L. STEWART

1187 EAST BROADWAY
SUITE 300
LOUISVILLE, KENTUCKY 40204

FAX (502) 540-3023

TELEPHONE (502) 589-2986

October 3, 1994

Mr. Lawrence Noble, General Counsel
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

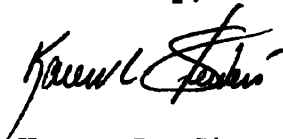
RE: Keenan v. Simon, et al.
MUR 4012

Dear Mr. Noble:

Pursuant to Mary L. Taksar's letter of July 28, 1994 regarding the above-referenced case, we enclose an original and three copies of Ms. Keenan's verified supplement to her original Verified Complaint of July 20, 1994, adding Count Seventeen.

Should you require any additional information, please advise.

Sincerely,



Karen L. Stewart, Esq.



Jennifer J. Hall, Esq.
OGDEN, NEWELL & WELCH
1200 One Riverfront Plaza
Louisville, Kentucky 40202
(502) 582-1601

/enclosure

28044203456

FEDERAL ELECTION COMMISSION
FILE NUMBER: MUR 4012

Maureen Keenan

COMPLAINANT

vs.

Frank G. Simon, M.D.

RESPONDENTS

Arthur A. Cerminara

Freedom's Heritage Forum

f/d/b/a Christian Coalition PAC,

f/d/b/a American Coalition for Traditional Values PAC

f/d/b/a Legislative Research PAC and

unknown individuals acting in concert

with the named Respondents

Supplement to Original Complaint

Count Seventeen

34. Complainant realleges, incorporates and reiterates the allegations set forth in paragraphs 1-33 of her original Complaint.

35. That upon information and belief, during the month of September 1994, the Respondents Freedom's Heritage Forum, Frank G. Simon and/or others acting on their behalf printed, paid for, and distributed a tabloid entitled "Congressional Candidate Report" supporting the candidacy of Richard Lewis, candidate for United States Congress, Third Congressional District, Kentucky. A copy of the tabloid is attached hereto as Exhibit "E."

36. That upon information and belief, the candidate Richard Lewis, and/or agents, campaign workers or other persons acting on his behalf, hand-delivered or otherwise personally distributed the tabloid described in paragraph 35 of this Complaint to the general public in Louisville, Jefferson County, Kentucky.

37. That upon information and belief, the expenditures set forth in paragraphs 35 and 36 of this Complaint were made by the

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Respondents with the cooperation, prior consent, and/or in consultation with the candidate Richard Lewis and/or others acting on behalf of Richard Lewis.


38. That upon information and belief, the expenditures set forth in paragraphs 35, 36 and 37 of this Complaint do not constitute "independent expenditures" as defined at 11 C.F.R.109.1.

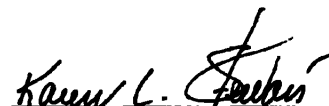
39. That upon information and belief, the expenditures set forth in paragraphs 35, 36 and 37 of this Complaint constitute in-kind contributions to the candidate Richard Lewis, as defined at 11 C.F.R. 109.1(c) and 11 C.F.R. 100.7 (a).

40. That upon information and belief, the expenditures set forth in paragraphs 35, 36 and 37 and made by the Respondents on behalf of the candidate Richard Lewis exceed the sum of \$1000.00, in violation of 11 C.F.R. 110.1, which prohibits any person, other than a multicandidate committee from making contributions to any candidate which in aggregate amount exceed \$1000.00.

Respectfully submitted,


Maureen Keenan, Complainant


Counsel for Complainant
Jennifer J. Hall, Esq.,
OGDEN, NEWELL & WELCH
1200 One Riverfront Plaza
Louisville, Kentucky 40202
(502) 582-1601


Counsel for Complainant
Karen L. Stewart, Esq.,
1167 East Broadway, Suite 300
Louisville, Kentucky 40204
(502) 589-2986

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COMMONWEALTH OF KENTUCKY)
)
COUNTY OF JEFFERSON)
_____)

Subscribed, acknowledged and sworn to by Maureen Keenan,
Complainant herein, before me on this the 2nd day of October
, 1994.

My commission expires:

Elizabeth A. Schuckel
NOTARY PUBLIC, STATE AT LARGE

28044203459

Congressional Candidate Report

GENERAL ELECTION: TUESDAY, NOVEMBER 6, 1994

The Candidates: Lewis, Stokes, Ward

Independent Candidate Lewis is building a strong coalition of Pro-Life Catholics, Protestants, Democrats, Republicans & African-Americans

An Independent candidate, Richard Lewis, has entered the race for the Third District Congressional seat because he believes there are no real differences between his opponents, Republican Susan Stokes and Democrat Mike Ward.

He strongly opposes the Clinton Healthcare Plan believing it will result in rationing of medical services and the selection of healthcare providers by the government rather than the individual. He also opposes it because of provisions in the plan that would mean taxpayer-funding for abortions. Democrat Ward, it is expected, would support any Clinton Healthcare Plan legislation if elected. Stokes has expressed support for some type of government healthcare plan that would penalize non-participants in a mandatory health insurance program.

Bi-partisan conservative support has come to Lewis for his positions on the abortion issue. He favors, for example, the right of women to know the possible complications from abortion prior to the operation

while both Stokes and Ward voted against such legislation in the Kentucky General Assembly. He also believes in parental notification prior to abortion for minors and uniform standards for safety and cleanliness equal to that of other surgical clinics. Both Stokes and Ward voted against parental notification of abortion for minors as well as safety and cleanliness standards for abortion clinics.

Lewis also opposes gays in the military and has not been endorsed by local homosexual activists. Both Stokes and Ward were publicly endorsed by the homosexual community in *The Letter, Kentucky's Gay & Lesbian Newspaper* in the primary election this past May.

One other issue separating Lewis from his opponents is property taxes; he opposes all new taxes while his opponents voted for a bill in the state legislature to repeal maximum limits on property taxes.

Lewis, who is an electrician and airplane mechanic, attends Highview Baptist Church with his wife Helen.

Lewis says the Clinton Healthcare Plan means rationed medical care and a poorer quality of healthcare for all Americans



Richard Lewis

Support for Republican Stokes has come from Gloria Steinem, gay activists and the feminist movement



Susan Stokes and Gloria Steinem following a meeting here in Louisville.

Republican Stokes still fending off charges she is a "Democrat running as a Republican" because of liberal positions

Susan Stokes earned the Republican nomination in a primary race much closer than expected against a conservative opponent. *The Courier-Journal* pointed out in an article prior to the primary that she was "playing defense on issues such as abortion, guns and homosexuality." In addition, she has expressed support for mandatory health insurance as called for in the Clinton Healthcare Plan that could penalize employers \$7,000 for each individual not covered in an insurance plan by that business owner.

On all of these issues her positions mirror those of the Democrat candidate Mike Ward. In fact, her liberal stances are the chief reason why an Independent candidate, Richard Lewis, has entered the race.

On the abortion issue she could be labeled a pro-abortion extremist, opposing legislation requiring

parental notification prior to abortions for minors, uniform safety and cleanliness standards for abortion clinics, and a woman's right to know the possible complications from an abortion prior to the operation. She is also the only state legislator that expressed support for the Freedom of Choice Act voted on in Congress that called for taxpayer-funding for late-term abortions up to the ninth month of pregnancy when the baby, of course, is able to live outside the mother's womb.

Endorsements and support have come from Gloria Steinem, a contributor to Democratic party candidates; local gay and lesbian activists who noted Stokes' support of President Clinton's efforts to put open homosexuals into the military; and feminists who vow only to vote for women for public office.

Liberal Democrat Ward represents 180° swing from retiring Mazzoli on abortion issue

A pro-life voice from the Third Congressional district will be absent if Democrat Mike Ward succeeds in replacing retiring Congressman Roman Mazzoli in this November's general election. This creates a dilemma for pro-life Democrats who have supported Mazzoli because both major parties are now running pro-abortion candidates.

Like his Republican opponent, Susan Stokes, Ward voted against parental notification of abortion for minors while serving in the state legislature, safety and cleanliness standards for abortion clinics equal to that of other surgical facilities, and legislation requiring that women considering an abortion be advised of possible complications from the operation.

His positions and voting record on abortion has garnered him endorsements from the National Organization for Women, whose criterion for endorsement is support for taxpayer-funded abortion and support for special rights and privileges for homosexuals.

Also he has been endorsed by homosexual activists because of his support of gays in the military. In an endorsement of Ward in the primary election, an editorial in *The Letter, Kentucky's Gay and Lesbian*

Mike Ward's support base includes pro-abortion groups, the gay community and *The Courier-Journal*



Mike Ward speaking at a Pro-Abortion rally in Frankfort in 1992.

Newspaper, noted that "Ward has continuously expressed his support of the gay and lesbian community."

This same publication advocates the development and implementation of a curriculum for Louisville schools that would present to students the "contributions" of lesbian and gay people throughout history.

Also, like Stokes, he supported legislation that would repeal "absolute maximum property tax rates."

Ward, as noted in a May 12 story in *The Courier-Journal*, "supports President Clinton's health care plan." The plan mandates coverage of employees in a healthcare plan by employers and payment for abortions for whatever reason, including birth control and for the purpose of sex selection.

"EXHIBIT E"

28044203460

COMPARE THE CANDIDATES' POSITIONS

ISSUE	INDEPENDENT LEWIS	DEMOCRAT WARD	REPUBLICAN STOKES
TAXPAYER-FUNDED ABORTION	AGAINST*	FOR**	FOR†
PARENTAL NOTIFICATION OF ABORTION FOR MINORS	FOR*	AGAINST**	AGAINST†
WOMEN'S RIGHT TO KNOW ABORTION COMPLICATIONS	FOR*	AGAINST**	AGAINST†
GAYS IN THE MILITARY	AGAINST*	FOR**	FOR†
GOVERNMENT-CONTROLLED HEALTHCARE	AGAINST*	FOR**	FOR†
HIGHER PROPERTY TAXES	AGAINST*	FOR**	FOR†
RESTRICTIVE GUN-CONTROL LEGISLATION	AGAINST*	FOR**	FOR†

TAXPAYER-FUNDED ABORTION

*Lewis -- Opposes Clinton Healthcare Plan that would mandate abortion as a federally guaranteed "health benefit."
(Campaign Position Paper)

**Ward -- Endorsed by National Organization for Women which requires of endorsed candidates their support for taxpayer-funded abortions.

†Stokes -- Supported the Freedom of Choice Act which would use taxes to pay for even late-term abortions up to the ninth month of pregnancy.

PARENTAL NOTIFICATION OF ABORTION FOR MINORS/WOMEN'S RIGHT TO KNOW ABORTION COMPLICATION

*Lewis -- Supports. (Campaign Position Paper)

**Ward/Stokes -- Both voted against legislation while in the General Assembly that would require parental notification and legislation requiring abortionists to inform women the risks of the procedure. (Legislative Record)

GAYS IN THE MILITARY

*Lewis -- Opposes. (Campaign Position Paper)

**Ward/Stokes -- Support. Both candidates were endorsed in the May primary by *The Letter, Kentucky's Gay and Lesbian Newspaper*. "They (gays) should be allowed." -- quote from Susan Stokes, *The Courier-Journal*, April 28, 1994.

GOVERNMENT-CONTROLLED HEALTHCARE

*Lewis -- Opposes. (Campaign Position Paper)

**Ward -- "Supports President Clinton's health care plan." *The Courier Journal* (May 12, 1994).

†Stokes -- Supports some type of federally-controlled healthcare plan. (Campaign Position Papers)

HIGHER PROPERTY TAXES

*Lewis -- Opposes. (Campaign Position Paper)

**Ward/Stokes -- Both voted for House Bill 19 repealing a maximum limit on property taxes and opening the door for higher property taxes. (Legislative Record)

RESTRICTIVE GUN-CONTROL LEGISLATION

*Lewis -- Opposes. (Campaign Position Paper)

**Ward -- Supports the restrictive Brady Bill. (Campaign literature)

†Stokes -- Favors firearm registration. (*The Courier Journal*, April 28, 1992)

IMPORTANT: Registered Democrats and Republicans can vote for Richard Lewis who actively opposes the liberal Clinton Agenda. Vote November 8, 6 a.m. to 6 p.m.

ADVERTISEMENT

FIGHT BACK!! By distributing this report to friends, neighbors, relatives, people at work, people at church. Call 895-6263 (day) or 426-1599 (nights and weekends) for additional copies. Donations to help pay for the printing of this report should be sent to "The Forum," P.O. Box 6689, Louisville, KY 40206. Checks should be made out to "The Forum."